

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

AXA EQUITABLE LIFE INSURANCE
COMPANY COI LITIGATION

This Document Relates to All Related Actions

ECF CASE

No. 16 Civ. 740 (JMF)

No. 17 Civ. 4767 (JMF) [rel. 740]

No. 17 Civ. 4803 (JMF) [rel. 740]

No. 18 Civ. 2111 (JMF) [rel. 740]

**~~PROPOSED~~ ORDER
CONCERNING DEADLINES FOR
PARTIES' PRETRIAL
SUBMISSIONS**

Based on the conference held on February 15, 2023, and the submission of the Parties dated March 1, 2023, it is hereby ordered that the following deadlines for pretrial exchanges and filings will govern the Related Actions:¹

Event		Deadline
1.	Parties exchange Witness Lists, Exhibit Lists, ² and Designations of Deposition Testimony	May 12, 2023
2.	Parties exchange Deposition Counter-Designations, Objections to Witness and Exhibit Lists, and Objections to Designations of Deposition Testimony	June 9, 2023
3.	Parties exchange Proposed Stipulations of Facts and Law, and Objections to Deposition Counter-Designations	June 30, 2023

¹ The deadlines for Events 1 through 8 may be modified by the Parties via unanimous consent of the Parties and without the entry of a further Court Order, provided that any such modified deadlines do not alter the deadlines for Events 9 through 16.

² The Parties' Exhibit Lists do not need to include (1) demonstrative exhibits; (2) summary exhibits under Federal Rule of Evidence 1006; and (3) exhibits to be used for impeachment purposes only on cross-examination or in rebuttal.

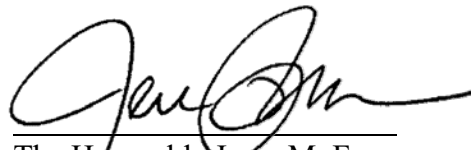
Event		Deadline
4.	Plaintiffs serve Draft Pre-Trial Orders (including proposed procedures and time limits for joint trial), Proposed <i>Voir Dire</i> Questions, Jury Instructions (including proposed preliminary jury instructions if any), and Verdict Forms	July 14, 2023
5.	Parties exchange Objections / Comments to Proposed Stipulations of Facts and Law	July 21, 2023
6.	Parties exchange Supplemental Exhibit Lists	August 11, 2023
7.	Defendant serves Objections / Comments to Draft Pre-Trial Order (including proposed procedures and time limits for joint trial), <i>Voir Dire</i> Questions, Jury Instructions (including proposed preliminary jury instructions if any), and Verdict Forms	August 18, 2023
8.	Parties exchange Objections to Supplemental Exhibit Lists	August 25, 2023
9.	Parties file Motions <i>in Limine</i>	September 6, 2023
10.	Parties file Joint Proposed Pre-Trial Orders and other Items required by Section 6 of the Court's Individual Rules	September 11, 2023
11.	Parties file Oppositions to Motions <i>in Limine</i>	October 2, 2023
12.	Defendant serves Data Available as of August 31, 2023, for Contract Damages Refresh	October 6, 2023
13.	Parties serve Summary Exhibits under Federal Rule of Evidence 1006	October 10, 2023
14.	Parties serve Objections to Summary Exhibits under Federal Rule of Evidence 1006 Parties' Experts serve Supplemental Damages Report Based on Contract Damages Refresh	October 20, 2023
15.	Final Pretrial Conference	October 25, 2023 at 9:30 a.m.
16.	Trial	October 30, 2023

Additionally:

1. The Court approves the revised Notices attached to the parties' March 1, 2023 letter.
2. Unless and until the Court orders otherwise, all pre-trial submissions will be filed on a consolidated basis. With respect to motions *in limine*, each side is granted up to 60 pages for their opening briefs and oppositions.
3. The parties shall file joint letter by March 30, 2023, addressing whether the consolidated common issues trial should include any individual issues for the Plaintiffs before the Court and issues relating to consolidation, including streamlining Plaintiffs' proof.

SO ORDERED.

DATED: March 3, 2023


The Honorable Jesse M. Furman
United States District Judge